

## REMARKS

Claims 18-29 and 30 have been amended. Claims 18-31 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### Section 102(e) Rejection:

The Office Action rejected claims 18-22, 25-29 and 31 under 35 U.S.C. § 102(e) as being anticipated by Mori. Applicants traverse this rejection in light of the following remarks.

**Regarding claim 18, contrary to the Examiner's assertion, Mori fails to disclose a plurality of device drivers, each operable to monitor an operational status of one of the plurality of devices.** Instead, Mori teaches sequentially bypassing each of the HDDs 200 until a loop fault is no longer detected. Mori teaches a system using a looped interface and a troubleshooting function. The system is shown in Figure 1 of Mori and includes a disc array comprising a plurality of hard disc drives (HDDs) 200, which are connected to a fibre channel 120 connected to a fibre channel port 110 that functions as a host for controlling devices in a loop. The system also includes a port bypass circuit 210 which can arbitrarily select and control the building into a loop or the bypassing of each HDD 200 according to a port bypass circuit controller 100. In the system, a faulty device (HDD 200) can cause a loop fault. Mori also teaches troubleshooting the loop fault by identifying and bypassing the faulty device (HDD 200) while the device is disconnected and replaced. Thus, Mori teaches a procedure for bypassing a HDD to specify a faulty location. More specifically, Mori teaches a method of identifying the faulty device by bypassing each HDD in turn until the loop fault is no longer detected. (Mori, Column 3 Line 46 – Column 4 Line 27)

Mori teaches,

“When a loop fault is caused, an initial HDD address is first set to bypass HDD according to a fixed rule and is stored (a step 501 shown in FIG. 5). In this

case, HDDs are bypassed in the ascending order of addresses and the address OX01 of a device (HDD) to be bypassed is stored.”

“As shown in FIG. 3A, HDD 200 having the stored address is bypassed from the interface loop using the port bypass circuit controller 100 (a step 502 shown in FIG. 5) and the loop is initialized (a step 503 shown in FIG. 5).”

“The initialization of the loop is executed when the fibre channel port 110 makes a predetermined packet rounded in the order of arrangement on the FC loop, checks HDD having what address is connected and writes the address of the connected HDD to the packet. When the packet is returned to the original fibre channel port 110 without an accident, it is judged that the system is recovered from the loop fault. In case the packet is not returned in fixed time, it is judged that the loop is disconnected and the loop fault is not recovered.” (Emphasis added) (Column 3 Line 55 – Column 4 Line 7)

The Examiner cites column 6, line 31 – column 7, line 38 of Mori and argues that when a loop fault occurs, the loop is tested to see if the fault occurred within or external to the loop. However, the cited reference makes no mention of a plurality of device drivers, each operable to monitor an operational status of one of a plurality of devices and consequent to change in the operational status, generate fault report data, as recited in claim 18.

The Examiner also cites Figure 5 of Mori and argues that a loop fault is a change in operational status. However, Figure 5 of Mori is a flowchart reciting steps of Mori’s troubleshooting method without mentioning anything regarding a plurality of device drivers, each operable to monitor an operational status of one of a plurality of devices. In fact, nowhere does Mori mention a device driver of any sort. Additionally, Mori fails to teach monitoring an operational status of any of the HDDs 200 as such. Instead, Mori performs the method described in Figure 3 when a loop fault (which is associated with the array of HDDs 200 and the loop formed by the fibre channel 120 as a whole) occurs. However, the method described in Figure 3 and the accompanying text also fails to mention a plurality of device drivers, each operable to monitor an operational status of one of plurality of devices. The Examiner has thus failed to show any teaching from Mori that includes a plurality of device drivers as recited in claim 18.

Additionally, Mori fails to disclose a fault response process operable to analyze generated fault report data generated by one or more of the device drivers to determine a faulty one of the plurality of devices. Instead, as noted above, Mori teaches a specific troubleshooting method to determine a fault in FC LOOP including multiple hard drives. Nowhere does Mori mention a fault response process analyzing generated fault report data to determine a faulty one of the plurality of devices.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Thus, for at least the reasons given above, the rejection of claim 18 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 18 also apply to claims 25 and 31.

Applicant also asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

**Allowable Subject Matter:**

Claims 23, 24 and 30 were objected to as being dependent upon a rejected base claim, but otherwise allowable if rewritten in independent form. In light of the above remarks, Applicants assert that claims 23, 24 and 30 are in condition for allowance in their present form.

## CONCLUSION

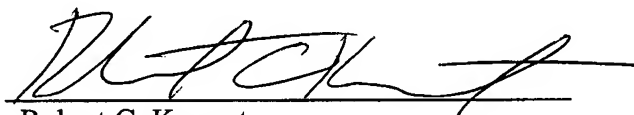
Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-10800/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Other:

Respectfully submitted,



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Date: April 4, 2005